



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

October 1, 2025

**By ECF**

Hon. Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *SEC v. Richard Dale Sterritt, Jr. et al.*, 1:21-cv-2008-KAM-LKE (E.D.N.Y.)

Dear Judge Matsumoto:

Pursuant to the Court's September 19, 2025 Order, Plaintiff Securities and Exchange Commission ("SEC") respectfully submits this status letter. For the reasons set forth below, the SEC further respectfully requests that the Court continue the current stay of this case while the SEC pursues settlement discussions with Defendants and that the SEC submit an additional status report in 90 days.<sup>1</sup>

By way of background, on April 14, 2021, the SEC filed this civil enforcement action against Defendants Richard Dale Sterritt, Jr. (a/k/a Richard Richman) ("Sterritt"), Michael G. Greer ("Greer"), Deanna L. Looney ("Looney"), Robert W. Magness, Jr. ("Magness"), Katie Mathews ("Mathews"), James Christopher Pittman ("Pittman"), and Mark Ross ("M. Ross") (collectively, "Defendants"); and Relief Defendants Naomi Ross ("N. Ross"), Robyn L. Straza ("Straza"), Angeliki (a/k/a Angie) Touhouliotis ("Touhouliotis"), and Rainmaker Advisors, LLC ("Rainmaker") (collectively, "Relief Defendants"). (Dkt. 1). The SEC alleges that Defendants engaged in (1) an offering fraud in the securities of Zona Energy, Inc. and the public issuer that later acquired Zona, ERF Wireless, Inc.; and (2) a market manipulation scheme related to a purported cannabis production company (and planned a similar scheme regarding ERF Wireless, Inc.). Consequently, Defendants obtained more than \$16 million in illicit proceeds, at least \$2.8 million of which were transferred to Relief Defendants.

Shortly before the SEC filed this case, on April 8, 2021, the United States Attorney's Office for the Eastern District of New York ("USAO") filed a parallel criminal case, *United States v. Richard Dale Sterritt, Jr. et al.*, 1:21-cr-193 (KAM) (E.D.N.Y.) (the "Criminal Action"). The USAO charged

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<sup>1</sup> Additionally, due to a lapse in federal government appropriations, on October 1, 2025, most SEC personnel will be furloughed (with limited exceptions) and are prohibited from working. SEC counsel assigned to this matter are being furloughed and thus are not available to work on it. *See* 31 U.S.C. § 1342.

Defendants Sterritt, Greer, Magness, and Ross with, *inter alia*, conspiracy to commit securities fraud related to the same misconduct alleged in the SEC case; and Defendant Straza (along with Defendants Sterritt, Greer and Magness) with money laundering conspiracy. In a later superseding indictment, the USAO also charged Defendant Pittman with, *inter alia*, conspiracy to commit securities fraud. (Dkt. 177.)

On May 28, 2021, this Court granted the USAO's motion to intervene in this case and stay the SEC case pending resolution of the Criminal Action. (Dkt. 18.)

At various times from July 2021 through June 2025, all Defendants charged in the Criminal Action pled guilty and were sentenced. (Criminal Action Dkt. Nos. 76, 136, 242, 250, 254, 351, 374, 485, 501, and 522.) The SEC expects that the above resolution of the Criminal Action will help facilitate resolution of the SEC's claims against Defendants and Relief Defendants in this case. In this regard, the SEC has conferred with Defendants Greer, Magness, Pittman, and Ross—and relief defendant Rainmaker Advisors, LLC—and these parties jointly request that the Court continue the stay of this case while the parties pursue settlement negotiations. Despite its best efforts, since the date of the Court's September 19, 2025 Order, the SEC has been unable to contact or confer with *pro se* Defendants Sterritt, Looney, and Mathews; and Relief Defendants Naomi Ross, Straza, and Touhouliotis. The SEC will continue its efforts to engage in settlement discussions with these Defendants as well.

Given that settlement discussions are ongoing, the SEC, with the consent of Defendants Greer, Magness, Pittman, and Ross—and Relief Defendant Rainmaker Advisors, LLC—respectfully (1) requests that the Court continue the stay of this case while the SEC pursues settlement; and (2) proposes to submit an additional status report in approximately 90 days. To the extent the SEC determines that it cannot reach settlement with one or more Defendants or Relief Defendants, the SEC anticipates requesting that the Court lift the stay and set a reasonable date by which Defendants and Relief Defendants must respond to the SEC's Complaint in this action.

Respectfully submitted,

/s/ Oren Gleich

Oren Gleich  
Senior Trial Counsel